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BY ECF AND EMAIL

Honorable Richard M. Berman
United States District Court
Southern District of New York
New York, New York 10007

USDC SDNY
DOCUMENT
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DATE FILED: 7/31/23

July 28, 2023

Re: United States v. O'Mara, No. 23 Cr. 72 (RMB)

Dear Judge Berman:

We write on behalf of our client, Mark O'Mara, to respectfully request the Court's approval for Mr. O'Mara to travel to Toronto, Ontario, Canada from August 16 through 23, 2023. He also requests to stay in the Western and Northern Districts of New York as part of the travel route to and from the destination of Toronto. In Toronto, Mark would be staying at 29 Morbank Drive, Toronto, ON, M1V 2M1 with the Bilse family (one of whom co-signed Mr. O'Mara's bail bond). The Pretrial Services Officer supervising Mr. O'Mara and the Government both consent to this request.

On February 7, 2023, Mr. O'Mara waived indictment and pleaded guilty before the Court to the charges contained in the above-referenced Information pursuant to a cooperation agreement with the Government, and he was subsequently released from custody pending his sentencing subject to bail conditions approved by the Court. Among other things, those bail conditions restrict Mr. O'Mara's travel to the Southern and Eastern Districts of New York, the District of New Jersey, the Middle District of Pennsylvania, and the Eastern, Middle, and Western Districts of Louisiana.

Mr. O'Mara would like to travel to Toronto, Ontario, Canada from August 16 through 23, 2023 to celebrate his son's seventh birthday (August 16th) with his son's best friend, who also turns seven (August 17th) and is in Toronto. Mr. O'Mara has been fully compliant with the conditions of his bail to date.

Accordingly, we respectfully request the Court's approval for Mr. O'Mara to travel to Toronto, Ontario, Canada, as well as the Western and Northern Districts of New York, from

August 16 through 22, 2023. The Pretrial Services Officer supervising Mr. O'Mara and the Government both consent to this request.

Respectfully submitted,

/s Samson A. Enzer
Samson A. Enzer
Nola B. Heller

cc: P.S.O. Christina Venable
A.U.S.A. Jane Kim
A.U.S.A. Catherine Ghosh

Application granted on
consent.

SO ORDERED:
Date: 7/31/23 Richard M. Berman
Richard M. Berman, U.S.D.J.